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# Shades of Seattle Paint Company Investigation Final Summary Report

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**TDDs: 99-04-0005, 99-06-0006, 99-09-0007**

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Contract: 68-W6-0008  
August 2000

Region 10

# ***START***

Superfund Technical Assessment and Response Team

Submitted To: Jeff Rodin, On-Scene Coordinator  
U.S. Environmental Protection Agency  
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## MEMORANDUM

DATE: August 31, 2000

TO: Jeff Rodin, On-Scene Coordinator, EPA, Seattle, WA

FROM: Dave Byers, Project Manager, E & E, Seattle, WA

SUBJ: Shades of Seattle Paint Company Investigation Final Summary

REF: Contract No.: 68-W6-0008  
TDD Nos.: 99-04-0005  
99-06-0006  
99-09-0007

### BACKGROUND

In April 1999, the United States Environmental Protection Agency (EPA) began receiving reports that containers of paint-related waste were being abandoned by an unknown person (or persons) around King and Snohomish Counties in Washington State. The abandoned containers were typically Rodda-brand products with masking tape wrapped around the containers. The EPA tasked Ecology & Environment, Inc. (E & E) under the Superfund Technical Assessment and Response Team (START) contract (68-W6-0008) Technical Direction Document (TDD) Numbers 99-04-0005, 99-06-0006, and 99-09-0007 to conduct removal assessments and provide minor containment of the abandoned containers of potentially hazardous materials at six sites included in the Shades of Seattle Paint Company Investigation.

### START ACTIONS

The START responded to six sites around King and Snohomish Counties in Washington State. At each site the START conducted a removal assessment, which included documenting the site with photographs; collecting product samples from the abandoned containers; and assessing the site to determine if product from the abandoned containers had been released to the environment. Once conditions at each site were documented, the START provided for the off-site transportation and disposal of the abandoned containers. At the first two sites the START responded to (TDD Numbers 99-04-0005 and 99-06-0006), the START transported the containers off site and properly disposed of them at Philip Environmental Services. At the four sites under TDD Number 99-09-0007, the START subcontracted Foss Environmental to transport and dispose of the containers off site.



### **Removal Assessments:**

Upon arriving at each site, the START photographed the condition of the site and the abandoned containers. The photographs taken by the START are attached to the trip reports prepared for each site. Once the containers were staged and inventoried, the START collected representative product samples from some of the abandoned containers. Following the response, a START chemist performed Pensky-Martens Closed-Cup Flash Point analysis on each of the samples in order to determine if the product met the Resource Conservation and Recovery Act (RCRA) ignitability criteria for hazardous waste. From the six sites, the START collected and analyzed a total of 30 samples. Two of the 30 samples were submitted to a commercial laboratory for volatile organic compound (VOC) analysis with EPA Method 8260B. The results of the 30 samples indicated that the containers abandoned at each site contained characteristic ignitability criteria hazardous waste as determined by their flashpoints being less than 140 degrees Fahrenheit [40 CFR 261.21 (a)(1)]. The VOC analysis of the two samples submitted to a commercial laboratory revealed the presence of toluene, ethylbenzene, xylene, naphthalene, and other VOCs. A summary of the samples collected at each site and the results of those samples are provided in Table 1. Specific details about the samples collected during the Shades of Seattle Paint Company investigation can be found in the trip reports prepared for each site.

<b>TABLE 1 SAMPLE SUMMARY SHADES OF SEATTLE PAINT COMPANY INVESTIGATION</b>		
<b>Site Name/TDD No.</b>	<b>Number of Samples Collected</b>	<b>Percent Meeting RCRA Ignitability Criteria for Hazardous Waste</b>
Lake City Paint Thinner Response/99-04-0005	6	100%
Redmond Container Site/ 99-06-0006	0	NA
University Village Drum Site/ 99-09-0007	5	100%
Mill Creek Site/99-09-0007	10	100%
Fales Road Dump Site/ 99-09-0007	5	100%
Redmond/Fall City Road Dump Site/99-09-0007	4	100%

To assess whether product from these abandoned containers had been released to the environment, the START performed air monitoring using a photoionization detector (PID) in the areas



where the containers were dumped. At all of the sites except for the University Village Drum Site, the PID detected VOCs at concentrations elevated above background indicating that product had been released to the environment although not in recoverable amounts.

#### **Minor Containment Actions:**

In addition to conducting removal assessments at each site, the START secured the abandoned containers and provided for the proper disposal of them. The containers from the responses were taken to the Small Quantity Generator Waste Acceptance Program at Philip Environmental Services in Seattle, Washington. The containers from the Redmond Container Site are still held under START custody. These containers have not been disposed of since the EPA Criminal Investigation Division has requested that the START hold onto the containers as criminal evidence. For the sites under TDD number 99-09-0007, the START subcontracted Foss Environmental of Seattle, Washington to properly transport and dispose of the containers abandoned at these four sites. A summary of the type and number of containers removed from each site is provided in Table 2. Table 2 also provides the total estimated volume of paint-related waste removed from each site. The START estimates that approximately 770 gallons of paint-related waste was recovered over the course of the Shades of Seattle Paint Company Investigation.

<b>TABLE 2 DISPOSAL SUMMARY SHADES OF SEATTLE PAINT COMPANY INVESTIGATION</b>			
<b>Site Name/TDD No.</b>	<b>Container Volume</b>	<b>Number of Containers Recovered</b>	<b>Total Estimated Volume of Waste Removed from the Site</b>
Lake City Paint Thinner Response/99-04-0005	2.5 gallon	35	130 gallons
	5 gallon	9	
Redmond Container Site/ 99-06-0006	2.5 gallon	0	115 gallons
	5 gallon	31	
University Village Drum Site/ 99-09-0007	2.5 gallon	0	96 gallons
	5 gallon	24	
Mill Creek Site/99-09-0007	2.5 gallon	55	230 gallons
	5 gallon	5	

**TABLE 2 (continued)**  
**DISPOSAL SUMMARY**  
**SHADES OF SEATTLE PAINT COMPANY INVESTIGATION**

Site Name/TDD No.	Container Volume	Number of Containers Recovered	Total Estimated Volume of Waste Removed from the Site
Fales Road Dump Site/ 99-09-0007	2.5 gallon	52	72 gallons
	5 gallon	0	
Redmond/Fall City Road Dump Site/99-09-0007	2.5 gallon	0	127 gallons
	5 gallon	28	

**Project Costs:**

A summary of all project costs current as of August 31, 2000 follows:

<u>TDD No.</u>	<u>Subcontract/Disposal Costs</u>	<u>Total Costs</u>
99-04-0005	\$926	\$2,167
99-06-0006	\$930	\$3,822
99-09-0007	\$17,196	\$28,601

**CONCLUSIONS:**

In April 1999, the START began responding to reports of abandoned containers dumped at locations around King and Snohomish Counties in Washington State. The START recovered, inventoried, and arranged for the off-site transport and disposal of approximately 770 gallons of paint-related waste. Based on air monitoring at five of the six dump sites, it would appear that product was released to the environment; however, the released material was not recoverable. A START chemist performed Pensky-Martens Closed Cup flashpoint analysis on samples from 30 of the 239 abandoned containers and determined that all of the samples exhibited flammable characteristics as defined by RCRA. Two samples were submitted to a commercial laboratory for VOC analysis. All of the containers at the site were transported and disposed of off site by either the START or the START's subcontractor, Foss Environmental. The total cost of the Shades of Seattle Paint Company Investigation is \$34,590. The only remaining work to be performed under this TDD is disposal of samples under custody following approval by the EPA On-Scene Coordinator and Criminal Investigator.